



Order Filed on May 5, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

836046  
PHELAN HALLINAN DIAMOND & JONES, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
856-813-5500  
Attorneys for Secured Creditor: CARISBROOK  
ASSET HOLDING TRUST

In Re:

ALBERT BROWN, JR A/K/A ALBERT BROWN

Case No: 18-34234 - JNP

Hearing Date: 04/28/2020

Judge: JERROLD N. POSLUSNY  
JR.

**CONSENT ORDER RESOLVING  
DEBTOR'S OBJECTION TO PROOF OF CLAIM AND CREDITOR'S  
OBJECTION TO CONFIRMATION**

The consent order set forth on the following pages, numbered two (2) through two (2) is hereby **ORDERED**.

**DATED: May 5, 2020**

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

**NJID 836046**

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Attorneys for CARISBROOK ASSET HOLDING TRUST

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE:

ALBERT BROWN, JR A/K/A  
ALBERT BROWN

CASE NO. 18-34234 - JNP

CHAPTER 13

Debtor

CONSENT ORDER RESOLVING  
DEBTOR'S OBJECTION TO PROOF OF  
CLAIM AND CREDITOR'S OBJECTION TO  
CONFIRMATION

HEARING DATE: 04/28/2020

This Consent Order pertains to the property located at 1138 EAST PARK AVENUE, VINELAND, NJ 08360-3337, mortgage account ending with "7553";

THIS MATTER having been brought before the Court by, CHRISTOPHER BAGNATO, Esquire attorney for debtor, ALBERT BROWN, JR upon the filing of a Chapter 13 Plan and an Objection to Proof of Claim, CARISBROOK ASSET HOLDING TRUST by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed an Objection to the Confirmation of said Chapter 13 Plan and Proof of Claim and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

IT IS on the                      day of                      , 2020, ORDERED as follows:

1. The Trustee is authorized not to pay the secured arrearage claim (Proof of Claim #3-1) of CARISBROOK ASSET HOLDING TRUST for the purpose of allowing the Debtor to apply and potentially complete a loan modification. Should the Debtor qualify for a loan modification, the loan modification must be approved no later than July 27, 2020.
2. Debtor agrees to submit a full loan modification application to Roundpoint Mortgage Servicing Corp., servicer for CARISBROOK ASSET HOLDING TRUST, within thirty (30) days of the date this Consent Order is entered by the Court.
3. Roundpoint Mortgage Servicing Corp., servicer for CARISBROOK ASSET HOLDING TRUST agrees to review the Debtor for a loan modification that if approved, would be

issued in his own name and would not require the cooperation or execution of the co-debtor and Debtor's ex-wife, Ruth Ann Edwards-Brown.

4. If the loan modification is approved, the Debtor shall file a Modified Plan, together with amended Schedule "J" reflecting debtors post loan modification budget, within 30 days of approval of final loan modification.

5. If a loan modification is not approved by July 27, 2020 or if a denial letter is issued prior to July 27, 2020, then the Debtor shall do one of the following within sixty (60) days of the earlier date: 1) file a Modified Plan to cure the arrearage claim; 2) file a Modified Plan to surrender the property subject to said claim; 3) file a Notice to Convert to Chapter 7; or 4) file a Notice to Dismiss Case.

6. CARISBROOK ASSET HOLDING TRUST agrees to allow the plan to be confirmed on an interim basis with a final confirmation date to be scheduled by the Trustee within sixty (60) days for status of the loan modification.

7. The Debtor shall continue making regular post-petition payments to CARISBROOK ASSET HOLDING TRUST outside Chapter 13 Plan. Any payments made by the Debtor, including any previously made trial plan payments, will be applied to the mortgage loan in accordance with the terms of the note and mortgage and Bankruptcy law.

The undersigned hereby consent to the form,  
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC  
Attorneys for Secured Creditor:  
CARISBROOK ASSET HOLDING TRUST

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
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Dated: 04/22/2020

/s/ Christopher F. Bagnato  
CHRISTOPHER BAGNATO, Esquire  
Attorney for debtors

Dated: 05/01/2020